



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 24, 2021

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Alan Tejeda-Isabel*, No. 20 Cr. 515 (JMF)**

Dear Judge Furman:

A pretrial conference in the above-captioned matter is scheduled for March 8, 2021, at 3 p.m. The Court also directed that the defense file any motions by February 25, 2021, that the Government file any opposition by March 11, 2021, and the defense file any reply by March 18, 2021.

The parties have been engaged in productive discussions regarding potential pretrial resolution of this case, but do not expect such discussions to be completed in advance of the forthcoming conference. The Government therefore writes to respectfully request that the Court adjourn the conference and filing deadlines. After conferring with the Court's chambers regarding available dates, the parties respectfully request that the Court adjourn the pretrial conference until May 3, 2021, at 2:30 p.m., and set the following deadlines: that the defense file any motions by April 23, 2021, that the Government file any opposition by May 7, 2021, and the defense file any reply by May 14, 2021.

The Government further respectfully requests that the Court exclude time under the Speedy Trial Act, from March 8, 2021 to May 3, 2021, to permit the parties time to continue negotiations towards potential pretrial resolution, including allowing defense counsel adequate time to advise the defendant in light of logistical challenges to communication caused by the COVID-19 pandemic. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, who has consented to the above requests.

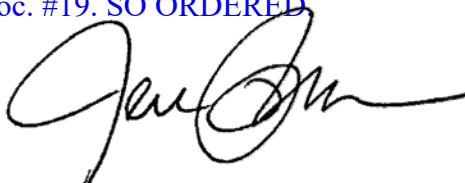
Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:   
Brett M. Kalikow  
Assistant United States Attorney  
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cc: Marisa Cabrera, Esq. (via ECF)

Application GRANTED. The schedule proposed by the Government is hereby ADOPTED and time excluded for the reasons stated by the Government. The Clerk of Court is directed to terminate. Doc. #19. SO ORDERED

  
February 24, 2021